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August 18, 2004

NE NPR-A Amendment Planning Team
Bureau of Land Management
Alaska State Office
222 West 7th Avenue
Anchorage, AK, 99513-7599

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Dear Planning Team,

1 I write in opposition to the preferred alternative for amending the oil and gas leasing plan for the northeast planning area of the National Petroleum Reserve-Alaska (NPR-A). I urge you to select Alternative A, the No Action Alternative, to sustain existing environmental and wildlife protection in the area, especially in the critical and fragile Teshekpuk Lake region.

2 The BLM is proposing to open a large proportion of the Teshekpuk Lake Surface Protection Area to oil and gas activity and my immediate concern is the fragile Teshekpuk Lake area and its importance to molting geese and other waterfowl, some of which make their way through my district in the fall.

3 A group of 140 internationally known ornithologists and scientists stated in their letter to the BLM, "For more than 40 years, the area north and east of Teshekpuk Lake has been recognized for its importance to molting geese. This area is remote, has deep-water lakes where flightless geese can escape predators, and offers sedges and grasses as high-quality forage. With these attributes, the area attracts up to 37,000 brant, 35,000 greater white-fronted geese, and thousands of Canada and snow geese in July and August for their annual molt. For brant, this number represents as much as 30 percent of the entire Pacific population."

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Birds

"The sensitivity of geese during their flightless, energy-demanding molt is well established. Molting geese will run at the sight of a distant person, and disturbance by aircraft overhead—to which brant apparently do not habituate—is a major problem. Behavioral responses to disturbance add stress to the already-taxing requirements of molting geese. Reductions in feeding time or excessive energy expenditures ultimately may compromise fitness and, hence, survival or reproductive success. The combined effects of industrial oil development in the Teshekpuk Lake area...may shrink habitat available to molting geese and displace them to less optimal habitats. The likely result would be reduced populations of brant and possibly other species, such as greater white-fronted goose."

Recent analysis by the Alaska Science Center suggests that 44 percent of the molting brant in the Teshekpuk Lake area have used lakes over the last five years that would be available (in their entirety or in part) for leasing under the preferred alternative. Since this area provides critical molting habitat for up to 30 percent of the population of Pacific brant, potential impacts to this population during their sensitive molting season could have substantial consequences to the Pacific Flyway population. Furthermore, the Pacific Flyway population is substantially below management objectives. Thus, increased development in this area may place this population at significant risk. In addition to brant, 44 percent of white-fronted geese and 58 percent of Canada geese have also used lakes for molting that would become available for leasing and industrial development under the preferred alternative.

The proposed 213,000-acre no-lease zone is too small to encompass the entire essential habitat used by molting geese. The National Research Council (2003) explained that the environmental effects of oil development extend well beyond the immediate "footprint" of an oilfield, so the functionally protected area will be even smaller. This small area also does not provide adequate protection for the many nesting birds, including yellow-billed loons, buff-breasted sandpiper, and the threatened spectacled eiders, which are vulnerable to increased numbers of predators (e.g., gulls, ravens and foxes) that are attracted to Arctic oilfields.

These waterfowl are important to many throughout North America. The native Alaskans rely on many species for subsistence. Additionally, these migratory birds are important to recreational hunting, viewing and education throughout the nation, including in my home district. Any oil and gas activities that will negatively affect the populations of the migratory birds that depend on the NPR-A should be prevented.

According to the Pacific Flyway Council in 1998, "eventual development of oil and gas fields associated with structures and disturbance in or near this area [Teshekpuk Lake] could have significant, long-term impacts on unique habitats used by geese, and the condition and survival of molt-stressed brant. The sensitive goose molting area should not be offered for leasing; it should not be open to construction of roads, pipelines, or other facilities; and seasonal human activity should be restricted, as necessary, to preserve the security of molting geese from disturbance and stress." The Pacific Flyway Council also recommends that the Teshekpuk Lake Special Area be given permanent protection from future development by Secretarial designation.

The 2003 National Academy of Sciences *Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope* reported that, despite their best efforts, the environmental effects of drilling continue to increase. They also predict more problems will arise as more of the area is opened to leasing.

Eighty-seven percent of the northeastern Reserve is already open to oil and gas companies for leasing. There is no science indicating that the sensitive areas now closed to leasing can be opened without impacting wildlife. In fact, in the five years since the 1998 northeast plan, additional information and analyses point toward significant impacts

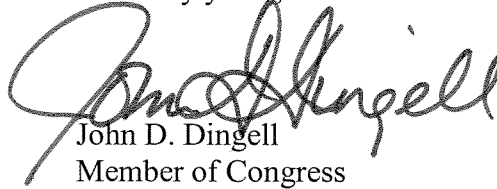
on fish and wildlife if more of this sensitive area is opened. It would be a mistake to risk the internationally significant ecological resources of Teshekpuk Lake for short-term supply of energy, especially when we know that the United States cannot drill its way to energy independence.

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Again, I urge you to choose Alternative A, the "No Action" alternative, to protect the reserve's irreplaceable wildlife, wilderness and subsistence values for future generations.

With every good wish,

Sincerely yours,

A handwritten signature in black ink, appearing to read "John D. Dingell". The signature is fluid and cursive, with the first name "John" being particularly prominent and stylized.

John D. Dingell
Member of Congress